



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

ENVIRONMENTAL SERVICES DIVISION
REGION 7
25 FUNSTON ROAD
KANSAS CITY, KANSAS 66115

RECEIVED

MAR 18 1993

RCOM SECTION

MAR 17 1993

MEMORANDUM

SUBJECT: Follow-up RCRA Inspection at Jesco Resources in
North Kansas City, Missouri (MOD985774736)

FROM: John W. Bosky *John W. Bosky*
Chief, RCRA Monitoring Section, EMCM/ENSV

TO: Sandi MacLeod
Environmental Engineer, RCOM/RCRA/WSTM

On February 18, 1993, I conducted a Follow-up RCRA Inspection at the Jesco Resources facility in North Kansas City, Missouri (MOD985774736). Inspection procedures and waste information are described on the attached checklists. Based on information obtained during this inspection, Jesco is a small-quantity generator of hazardous waste, and all hazardous waste currently generated by Jesco is being transported to the Solvent Recovery Corporation (SRC) facility in Kansas City, Missouri. At the time of the inspection, Jesco had two drums of hazardous waste in storage outside the manufacturing building (1 drum of oil dry and dried floor residue, and 1 drum of production leakage and process clean-out). Both of these drums were closed, labeled and in good condition, and both had been in storage for less than 180 days. Two satellite accumulation containers were located inside of the manufacturing building. One container (16 gallon) was for oil separation filters and was empty. The other drum (55 gallon) was for oil dry and dried floor residue, and was partially filled. This drum was closed, labeled and in good condition. With one significant exception, manifests and LDR notices used by Jesco appear to be properly completed.

Following the inspection, I attempted to correlate information obtained during the inspection with information that was in the existing WSTM site file. During this process, I discovered that analytical information submitted to EPA for the production leakage and process clean-out waste showed it to be both a D008 and D040 TCLP hazardous waste. However, manifests and LDR notices used by Jesco for this waste only identify this waste as being a D008 TCLP hazardous waste. Several of these manifests and LDR notices were submitted to EPA and are in the existing WSTM site file. During subsequent telephone conversations with Jesco and SRC representatives, I was informed that no additional testing of this waste had been conducted, that



R00029867

RCRA Records Center



the D040 code had been dropped in error, and that no one at SRC or Jesco had realized that the waste was not being properly identified. It should also be noted that the analytical information submitted to the EPA by Jesco for this waste has detection levels that, in some cases, are higher than the TCLP level.

If you have any questions, or if I can provide any additional information regarding this inspection, do not hesitate to contact me at 551-5061.

Attachments

Activity #: APFS2Page 1 of 16PRE-INSPECTION WORKSHEETGENERAL INFORMATION

1. Facility Name: NESCO RESOURCES, INCORPORATED 2. Inspection Date: 4/18/93
 3. Facility Address: 1437 GENTRY (P.O. Box 12337) 4. EPA I.D. #: MOD985774736
NORTH KANSAS CITY, MO 64116 5. State I.D. #: 005424
 6. Location Information: _____

7. Facility Contact: SAL FASONIE Phone #: (816) 471-4590
 8. Inspector Name/Title: JOHN BOWY, Supv. ENV. ENGR. Phone #: (913) 551-5061
 9. Inspection Type: ☐ SQG ☐ LQG ☐ TSD ☒ Other Inspection #: A77
Follow-up Inspection

TRAVEL INFORMATIONDates of Travel: 2/18/93 ☒ GOV ☐ POV

Date	Hotel	Phone #	Rate
_____	_____	() _____	_____
_____	_____	() _____	_____
_____	_____	() _____	_____

Additional inspection conducted during this trip? ☐ YES ☒ NO

Where: _____

Compensatory time requested? ☐ YES ☒ NO # of hours: _____ Dates: _____Overnight vehicle requested? ☐ YES ☒ NOCar signed out? ☒ YES ☐ NO Vehicle #: PMEM BRANCH GOVNOTE: Provide a copy of this page for the secretary and mark the copy → ☐ Secretaries CopyCONTACTS

10. Compliance Officer/Phone # : SANDI MAC LROD 913/551-7645 2/11/93
 11. State Contact/Phone #/ ☒ N/A : MDNR INVITED, BUT DID NOT PARTICIPATE
 Location _____

12. Permit Writer/Phone # ☒ N/A : _____
 13. Attorney/Phone # ☒ N/A : _____
 14. Other Contacts/Phone # ☒ N/A : _____

Activity #: API-52Page 2 of 16KEY INFORMATION FROM FILE REVIEW15. Date of last inspection: 6/14/91 ☐ Not previously inspected16. Key information from last inspection: _____
(operations, waste streams/codes, waste management processes, etc.)SEE REPORT IN FILE; MAJOR FINDING WAS THAT SEVERAL
FACILITY WATERS HAD NOT BEEN TESTED, AND HAD NOT
UNDERGONE CLASSIFICATION TO DETERMINE IF HAZARDOUS17. Compliance/Administrative issues from last inspection: COMPLAINT/COMPLIANCE ORDER
WAS ISSUED 2/2/92. CONSENT AGREEMENT/CONSENT ORDER WAS
SIGNALIZED 11/5/92.18. Most recent notification copied: ☐ YES ☒ NOIN FILE19. Key Interim Status information: ☒ N/A
(container/tank storage limits, etc.)Key Permit Information: ☒ N/A20. OTHER RECORDS/COMPLIANCE INFORMATIONIN FILE21. Copies of facility map or diagram made? ☐ YES ☒ NO ☐ N/A22. Additional Notes: _____

Activity #: APFS2Page 3 of 16RESULTS OF DISCUSSIONS WITH COMPLIANCE OFFICER AND SPECIFIC INSTRUCTIONS23. ✓ ISCO HAS BEEN ISSUED A COMPLIANCE ORDER- WHAT WASTES ARE NOW GENERATED• how much• is disposal proper- how ARE WASTES MANAGED ON-SITE- CHECK MANIFESTS- WHAT IS CURRENT GENERATOR STATUS

Activity #: APR-2Page 4 of 1624. ADDITIONAL PRE-INSPECTION ITEMS TO CHECK

General Equipment:	<input checked="" type="checkbox"/> hardhat	- rubber boots	- safety shoes
	<input checked="" type="checkbox"/> safety glasses	<input checked="" type="checkbox"/> tape measure	- SLR camera
	<input checked="" type="checkbox"/> other camera	<input checked="" type="checkbox"/> notebook	<input checked="" type="checkbox"/> flashlight
	<input checked="" type="checkbox"/> calculator	- compass	<input checked="" type="checkbox"/> binoculars
	<input checked="" type="checkbox"/> dictaphone	- tape recorder	<input checked="" type="checkbox"/> pens/markers
	- post-its	- safety gloves	- winter gloves
	- coveralls	<input checked="" type="checkbox"/> safety boots	<input checked="" type="checkbox"/> ear plugs
	<input checked="" type="checkbox"/> film	- ice chest	<input checked="" type="checkbox"/> coat
	<input checked="" type="checkbox"/> pH paper	<input checked="" type="checkbox"/> batteries	- respirator

Special Equipment?: _____

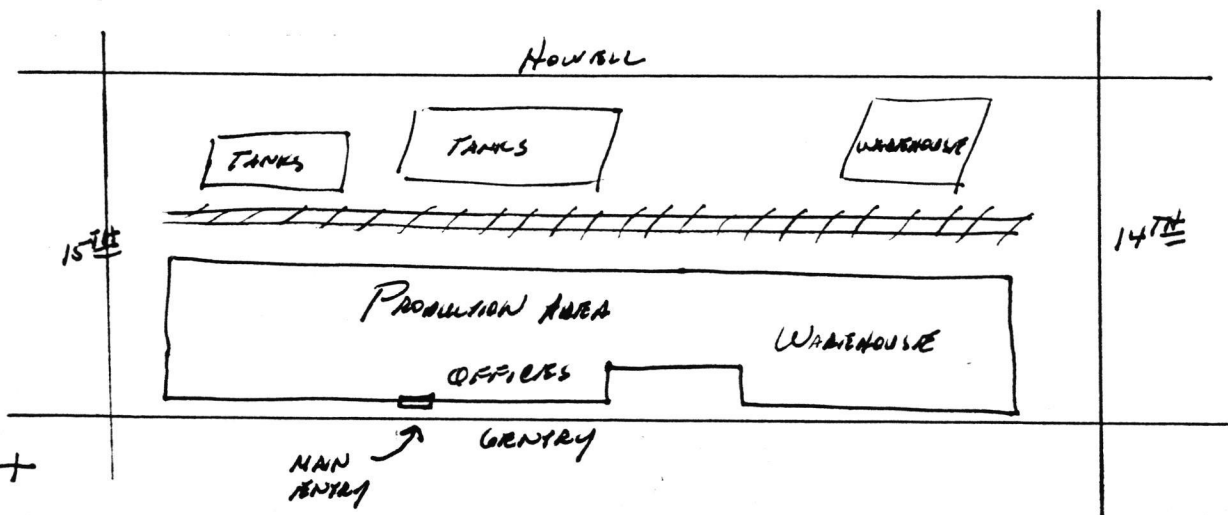
Paperwork:	<input checked="" type="checkbox"/> facility files	<input checked="" type="checkbox"/> CBI forms
	<input checked="" type="checkbox"/> NOV forms	- Notification forms
	- Pollution Prevention forms	- Multi-Media forms
	- Data Collection Worksheets	<input checked="" type="checkbox"/> (Air, Water, SPCC, Title III)
	<input checked="" type="checkbox"/> Reference Information	- Regulations (Federal/State)

☒ Load Camera☒ Credentials☒ Business Cards☒ Daily Planner☒ Car Book/Keys/Credit Card☒ Special Health or Safety Considerations?☒ Change Phone Message/Setting☒ Sign-out On Board

Notes: _____

Activity #: APR52Page 5 of 16DRIVE-BY WORKSHEET

1. Arrival time: 2:00 PM
2. Drive-by conducted from public right-of-way? ☒ YES ☐ NO
3. Determine the direction "North" with respect to the facility and provide a brief sketch of the layout and orientation (as can be viewed from the public right-of-way):



4. Obvious concerns visible from public right-of-way?
(Note area(s) of concern)

☐ YES ☒ NO

- ☐ Containers
- ☐ Loading Areas
- ☐ Open Drums
- ☐ Unusual Odors
- ☐ Safety Concerns

- ☐ Tanks
- ☐ Unloading Areas
- ☐ Stressed Vegetation
- ☐ Obvious Discharges
- ☐ Other Concerns

- ☐ Processing Equipment
- ☐ Security Devices
- ☐ Unusual Staining
- ☐ Improper Disposal

5. Notes/Observations:

5. Photo's Taken? ☐ YES ☒ NO

Photo Numbers:

(note location/direction on sketch)

DOCUMENTATION: HOW are the facts known? WHO said what? WHEN did it happen?
HOW long did it happen? and WHAT PROOF WAS OBTAINED?

Activity #: APF52Page 6 of 16SITE ENTRY AND INBRIEFING WORKSHEET

1. Initial entry procedures:

☒ Used main entrance☐ Entered during normal operating hours2. Facility Representative(s): IE. EUGENE PARKERTitle: PLANT MANAGERSAL FASONETitle: DIRECTOR OF TECHNICAL SERVICESROSS LONGWELL (NEWLY HIRED)Title: ENV. AFFAIRS MANAGER3. Does the facility representative(s) have intimate knowledge of all aspects of the waste generation and management practices? ☒ YES ☐ NO
(How was this verified?)BY QUESTIONING4. How long has facility representative worked in their position? VARIOUS LONGUITIES5. Were unreasonable or excessive delays encountered (>15 minutes): ☐ YES ☒ NO

6. Introduction:

☒ Presented credentials☒ Verified presence at correct facility (checked address/I.D. #)☒ Explained authority to conduct inspection (Section 3007 of RCRA)☒ Explained the purpose, scope, and order of the inspection☒ Explained documentation process through the use of worksheets, checklists, photo's, notes, statements, etc.☒ Explained EPA's need to collect and the facilities responsibility to provide accurate information and provided copies of Section 1001 and 1002 U.S.C. to facility☒ Explained facility's right to claim CBI and provided pages 1 and 2 of CBI form for signatures☒ Identified personal safety considerations: _____☒ Explained that findings and observations are based on your current knowledge of RCRA and that the final findings may differ7. Was full access granted? ☒ YES By who? (name): MR. PARKER☐ NO Obtain name of person denying access, time of denial, reason for denial, or note limitations placed on access: _____

DOCUMENTATION:	HOW are the facts known?	WHO said what?	WHEN did it happen?
	HOW long did it happen?	and WHAT PROOF WAS OBTAINED?	

Activity #: APFS 2Page 7 of 16FACILITY BACKGROUND WORKSHEET

1. Site history:

Date facility began operating: 1929 Number of employees: 250
Number of shifts/hours worked: 1 Number of days worked per week: 5
Size (sq. ft., how divided): 3 1/2 ACRES TOTAL

Property owner and facility operator the same? ☒ YES ☐ NORICHARD S. HOWELL, PRESIDENT

2. Major products or services provided: PRODUCTION OF OIL AND GREASE
ITEMS FOR USE IN THE MINING AND AUTOMOTIVE INDUSTRIES.

3. Major raw materials used: HIGHLY REFINED BASE OIL STOCK, LYE SOAP,
PERFORMANCE ADDITIVES (TCE, MINERAL SPIRITS, HEATING FLUIDS,
LEAD, LITHIUM, ANTIMONY.)

4. Major manufacturing or processing operations which generate waste streams:
(provide brief description)

OperationWaste Stream(s)SEE ATTACHED FORMS

5. Complete a Generator Waste Stream Worksheet and/or Off-Site Waste Stream Worksheet for the waste streams noted above and then finish this form.

Activity #: APFS2Page 6 of 166. Verified/compared above information with facility Notification Form: ☒ YES ☐ NO

7. GENERATOR STATUS: ☐ CE (0-100kg/mo) ☒ SQG (100-1000kg/mo) ☐ LQG (>1000kg/mo)
(based on records review)

Is facility's status solidly within above category? ☒ YES ☐ NO
(If not carefully verify status and document)

SEE SUMMARY of 1992 SWIMMERS - ATTACHMENT I

8. TSD STATUS: ☐ Treatment ☐ Storage ☐ Disposal

Note: Types of units, number of units, capacities, processes, etc.

9. Resolved questions from Pre-Inspection Worksheet? ☒ YES ☐ NO ☐ No Questions

10. Resolved compliance officers questions from Pre-Inspection Worksheet? ☒ YES ☐ NO
☐ No Questions

11. Requested site map or diagram to identify all observations? ☒ YES ☐ None available

IN FILE ALREADY

DOCUMENTATION:	HOW are the facts known?	WHO said what?	WHEN did it happen?
	HOW long did it happen?	and WHAT PROOF WAS OBTAINED?	

Activity #: APF52Page 9 of 16GENERATOR WASTE STREAM WORKSHEET

1. Name of waste stream: Oil SEPARATION FILTRATION STREAM (FILTERS)
2. Waste stream generation process: 12" X 3" FILTERS FROM OIL SEPARATOR UNIT; SRC REFERENCE #5868

3. Amount and frequency of waste stream generation (note amount per ?):

_____ Gallons _____ Pounds per ☐ Day ☐ Week ☐ Month
☒ Other : 12 FILTERS AROUND ONCE PER YEAR
☐ Unknown: _____

Formulas/Calculations: _____

4. On-site management practices (check all that apply):

☒ Satellite Accumulation ☒ Container Storage ☐ Tank Storage
☐ Treatment ☐ Disposal ☐ Other

Stated storage times (days): ☐ <90 ☒ <180 ☐ <270 ☐ I.S./Permit

5. Off-site management activities:

Shipped to: SOLVENT RECOVERY CORPORATION
Frequency of shipments: AROUND ONCE PER YEAR
Transporter: SOLVENT RECOVERY CORPORATION
Ultimate disposition of waste: ☐ Known ☐ unknown

6. Number or years/months facility generated this waste: From: _____ To: _____

7. Were there any changes (over time) in the type(s) of waste generated from this process and/or in the management of this waste?

☐ YES ☐ NO8. Facility considers this waste to be: ☒ Hazardous ☐ Non-Hazardous9. Method of waste determination/identification: ☐ Not completed by facility
(check all that apply)☐ By product knowledge
(MSDS, other info)☐ By process knowledge
(use of material)☒ By testing
(test results)

Activity #: APR-52Page 10 of 16

10. EPA waste codes identified by facility: 0000

11. Were non-hazardous waste determinations adequate? ☐ YES ☐ NO

12. Were hazardous waste determination adequate? ☒ YES ☐ NO
(includes LDR and analysis for on-site treatment)

13. Waste determination made by inspector? ☐ YES ☐ NO

(Remember to obtained proof to support your waste determinations)

14. Copies of waste determination obtained if necessary? ☐ YES ☐ NO

15. Is waste stream consistent with generator Notification? ☒ YES ☐ NO

16. Notes/Observations:

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VISUAL VERIFICATION SECTION

17. Are waste generation processes the same as previously described?: ☒ YES ☐ NO

18. Do the EPA waste codes appear correct? ☒ YES ☐ NO
(If no, list apparent codes & provide supporting information)

20. Notes/Observations:

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DOCUMENTATION:	HOW are the facts known?	WHO said what?	WHEN did it happen?
	HOW long did it happen?	and WHAT PROOF WAS OBTAINED?	

1. Name of waste stream: Q.I DRY AND DRIES FLOOR RESIDUE
2. Waste stream generation process: GENERATED FROM FLOOR CLEANING;
SRC REFERENCE # 5186

Formulas/Calculations: _____

☐ Treatment ☐ Disposal ☐ Other

Ultimate disposition of waste: ☐ Known ☐ Unknown

☐ YES ☐ NO

~~□ By testing
(test results)~~

Activity #: APF52Page 12 of 1610. EPA waste codes identified by facility: 000811. Were non-hazardous waste determinations adequate? ☐ YES ☐ NO12. Were hazardous waste determination adequate?
(includes LDR and analysis for on-site treatment) ☒ YES ☐ NO13. Waste determination made by inspector? ☐ YES ☐ NO

(Remember to obtain proof to support your waste determinations)

14. Copies of waste determination obtained if necessary? ☐ YES ☐ NO15. Is waste stream consistent with generator Notification? ☒ YES ☐ NO

16. Notes/Observations: _____

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VISUAL VERIFICATION SECTION17. Are waste generation processes the same as previously described?: ☒ YES ☐ NO18. Do the EPA waste codes appear correct?
(If no, list apparent codes & provide supporting information) ☒ YES ☐ NO

20. Notes/Observations: _____

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DOCUMENTATION:	HOW are the facts known?	WHO said what?	WHEN did it happen?
	HOW long did it happen?	and WHAT PROOF WAS OBTAINED?	

Activity #: APP 5-2Page 13 of 10GENERATOR WASTE STREAM WORKSHEET

1. Name of waste stream: PETROLEUM TANK BOTTOMS
2. Waste stream generation process: CLEAN-OUT OF TANK ASSOCIATED WITH WASTEWATER TREATMENT; SRC REFERENCE # 5089.
3. Amount and frequency of waste stream generation (note amount per ?):
- _____ Gallons _____ Pounds per ☐ Day ☐ Week ☐ Month
- ☐ Other: ANTICIPATE 102 DRUMS EVERY 5 YEARS
- ☐ Unknown: _____
- Formulas/Calculations: IN 1991, CLEANED 20 YEARS ACCUMULATION, 3071 pounds
4. On-site management practices (check all that apply): (ONLY DURING ACTUAL CLEAN-OUT)
- ☒ Satellite Accumulation ☒ Container Storage ☐ Tank Storage
- ☐ Treatment ☐ Disposal ☐ Other
- Stated storage times (days): ☐ <90 ☒ <180 ☐ <270 ☐ I.S./Permit
5. Off-site management activities:
- Shipped to: SOLVENT RECOVERY CORPORATION
- Frequency of shipments: ANTICIPATE EVERY 5 YEARS
- Transporter: SOLVENT RECOVERY CORPORATION
- Ultimate disposition of waste: ☐ Known ☐ Unknown
6. Number or years/months facility generated this waste: From: _____ To: _____
7. Were there any changes (over time) in the type(s) of waste generated from this process and/or in the management of this waste?
- ☐ YES ☐ NO

8. Facility considers this waste to be: ☒ Hazardous ☐ Non-Hazardous
9. Method of waste determination/identification: ☐ Not completed by facility
- (check all that apply)
- ☒ By product knowledge (MSDS, other info) ☒ By process knowledge (use of material) ☐ By testing (test results)

Also BASED ON KNOWLEDGE OF A SIMILAR WASTE AT FACILITY, PRODUCTION LEAKAGE AND CLEAN-OUT

Activity #: AD-52Page 14 of 1610. EPA waste codes identified by facility: D008 D04011. Were non-hazardous waste determinations adequate? ☐ YES ☐ NO12. Were hazardous waste determination adequate?
(includes LDR and analysis for on-site treatment) ☒ YES ☐ NO13. Waste determination made by inspector? ☐ YES ☐ NO

(Remember to obtained proof to support your waste determinations)

14. Copies of waste determination obtained if necessary? ☐ YES ☐ NO15. Is waste stream consistent with generator Notification? ☒ YES ☐ NO

16. Notes/Observations: _____

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VISUAL VERIFICATION SECTION17. Are waste generation processes the same as previously described?: ☒ YES ☐ NO18. Do the EPA waste codes appear correct?
(If no, list apparent codes & provide supporting information) ☒ YES ☐ NO

20. Notes/Observations: _____

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DOCUMENTATION:	HOW are the facts known?	WHO said what?	WHEN did it happen?
	HOW long did it happen?	and WHAT PROOF WAS OBTAINED?	

Activity #: APF52Page 15 of 19GENERATOR WASTE STREAM WORKSHEET

1. Name of waste stream: PRODUCTION LEAKAGE AND PRODUCTS CLEAN-OUT
2. Waste stream generation process: GENERATED FROM THE CLEANING OF LARGER LIQUID SPILLS AND THE REMOVAL OF RESIDUES FROM PROCESS EQUIPMENT; SEE REFERENCE # 5187
3. Amount and frequency of waste stream generation (note amount per ?):

_____ Gallons _____ Pounds per ☐ Day ☐ Week ☐ Month

☒ Other: LOSS THAN 1 DRUM PER MONTH

☐ Unknown: _____

Formulas/Calculations: _____

4. On-site management practices (check all that apply):

☒ Satellite Accumulation ☒ Container Storage ☐ Tank Storage

☐ Treatment ☐ Disposal ☐ Other

Stated storage times (days): ☐ <90 ☒ <180 ☐ <270 ☐ I.S./Permit

5. Off-site management activities:

Shipped to: SOLVENT RECOVERY CORPORATION

Frequency of shipments: SEVERAL TIMES PER YEAR

Transporter: SOLVENT RECOVERY CORPORATION

Ultimate disposition of waste: ☐ Known ☐ Unknown

6. Number or years/months facility generated this waste: From: _____ To: _____

7. Were there any changes (over time) in the type(s) of waste generated from this process and/or in the management of this waste?

☐ YES ☐ NO

8. Facility considers this waste to be:
- ☒
- Hazardous
- ☐
- Non-Hazardous

9. Method of waste determination/identification:
- ☐
- Not completed by facility
-
- (check all that apply)

☐ By product knowledge
(MSDS, other info)☐ By process knowledge
(use of material)☒ By testing
(test results)

Activity #: APR52Page 60 of 1010. EPA waste codes identified by facility: 0008 004011. Were non-hazardous waste determinations adequate? ☐ YES ☐ NO12. Were hazardous waste determination adequate? ☒ YES ☐ NO
(includes LDR and analysis for on-site treatment)

NOTE: DETECTION LEVELS FOR MANY PARAMETERS ABOVE
TCLP cutoff levels on analytical information
SUBMITTED BY JESCO TO EPA ON 10/1/91 (SEE FILE),
IN RESPONSE TO NOI ISSUED DURING PREVIOUS RCRA CFI

13. Waste determination made by inspector? ☐ YES ☐ NO

(Remember to obtain proof to support your waste determinations)

14. Copies of waste determination obtained if necessary? ☐ YES ☐ NO15. Is waste stream consistent with generator Notification? ☒ YES ☐ NO

ALTHOUGH TESTING BY JESCO SHOWED THIS TO BE A 0008 AND 0040
HAZARDOUS WASTE, ALL OF THE MANIFESTS AND LDR NOTICES USED FOR OFF-SITE
SHIPMENT ONLY LIST 0008.

16. Notes/Observations: MANIFESTS ONLY IDENTIFY THIS WASTE
AS 0008. LDR NOTICES FOR THIS WASTE ALSO ONLY LIST 0008.

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VISUAL VERIFICATION SECTION17. Are waste generation processes the same as previously described?: ☒ YES ☐ NO18. Do the EPA waste codes appear correct?
(If no, list apparent codes & provide supporting information) ☒ YES ☐ NO- SEE ABOVE FOR EXPLANATION -20. Notes/Observations: MANIFESTS AND LDR NOTICES PREPARED FOR JESCO
BY SOLVENT RECOVERY CORPORATION. ALTHOUGH TEST INFORMATION WAS SUPPLIED
SUBMITTED TO SOLVENT RECOVERY CORPORATION THAT SHOWS THE WASTE TO BE 0008
AND 0040, THE 0040 CODE HAS NEVER BEEN INCLUDED IN ANY
OF THE PAPERWORK PREPARED BY SOLVENT RECOVERY CORPORATION.

DOCUMENTATION:	HOW are the facts known?	WHO said what?	WHEN did it happen?
	HOW long did it happen?	and WHAT PROOF WAS OBTAINED?	

U.S. ENVIRONMENTAL PROTECTION AGENCY
RCRA INSPECTION
CONFIDENTIALITY NOTICE

Name and Address of Inspector(s) <i>John Boney</i> U.S. EPA, Region VII ENSV Division 25 Funston Road Kansas City, Kansas 66115	Name and Address of Facility <i>JESCO RESOURCES</i> <i>NORTH KANSAS CITY, MO 64116</i>	
	Owner, Operator, or Agent in Charge <i>Grant Parker</i>	
	Title <i>Plant Manager</i>	
	Address <i>1437 Gentry Street</i> <i>NORTH KANSAS CITY, MO 64116</i>	
Name of Individual to Whom Notice Given <i>Grant Parker</i>	Title <i>Plant Manager</i>	Date <i>2/18/93</i>

It is possible that EPA will receive public requests for release of the information obtained during inspection of the facility above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 U.S.C. 552; EPA regulations issued thereunder, 40 CFR Part 2; and the Resource Conservation and Recovery Act, Section 3007, as amended. EPA is required to make inspection data available in response to FOIA requests, unless the Administrator of the Agency determines that the data contains information entitled to confidential treatment.

Any or all of the information collected by EPA during the inspection may be claimed confidential, if it relates to trade secrets or commercial of financial matters that you consider to be confidential. If you make claims of confidentiality, EPA will disclose the information only to the extent, and by the means of the procedures set forth in the regulations (cited above) governing EPA's treatment of confidential information. Among other things, the regulations require that the EPA notify you in advance of publicly disclosing any information you have claimed and certified confidential.

To claim information confidential, you must certify that each claimed item meets all of the following criteria:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.
2. The information is not, and has not been, reasonably obtained without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on a showing of special need in a judicial or quasi-judicial proceeding).
3. The information is not publicly available elsewhere.
4. Disclosure of the information would cause substantial harm to your company's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time you may make claims that some or all of the information is confidential and meets the four criteria listed above.

RCRA INSPECTION CONFIDENTIALITY NOTICE

Facility

JASCO RESEARCH

If you are not authorized by your company to make confidentiality claims, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials, to the Owner, Operator, or Agent in Charge of your firm, within two days of this date. That person must return a statement, specifying any information which should receive confidential treatment.

This statement from the Owner, Operator, or Agent in Charge should be addressed to:

Mr. David A. Wagoner
Director, Waste Management Division
United States Environmental Protection Agency
726 Minnesota Avenue
Kansas City, Kansas 66101

and mailed by registered, return-receipt requested mail with in seven (7) calendar days of receipt of this Notice.

Failure by your firm to submit a written request that information be treated as confidential, either at the completion of the inspection or by the Owner, Operator, or Agent in charge, within the seven-day period, will be treated by the EPA as a waiver by your company of any claims for confidentiality regarding the inspection data.

To be completed by the facility official receiving this Notice:

I have received and read this Notice.

✓ Name

Sal Fasone

Title

DIRECTOR TECHNICAL SERVICE

Signature

Sal Fasone

Date

2-18-93

If there is no one on the premises of the facility who is authorized to make business confidentiality claims for the firm, a copy of this Notice and other inspection materials will be sent to the Owner, Operator, or Agent in charge of the company. If there is another company official who should also receive this information, please designate below:

Name

Title

Address

U.S. ENVIRONMENTAL PROTECTION AGENCY
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

REQUEST FOR CONFIDENTIAL TREATMENT

Name of Individual <i>SAL FASONE</i>	Title <i>Dir of Tech Services</i>	Date <i>7/8/83</i>
Firm Name <i>STEEL RESOURCES</i>	Firm Address <i>1437 CANTAY STREET NORTH KANSAS CITY, MO 64116</i>	

Information for which Confidential Treatment is requested:

NOTHING CLAIMED AS CBI DURING INSPECTION

Acknowledgement of Claimant

The undersigned requests that confidential treatment of the information described be provided in accordance with provisions of the Freedom of Information Act (FOIA), 5 U.S.C. 552; EPA regulations issued thereunder, 40 CFR Part 2; and the Resource Conservation and Recovery Act (RCRA), Section 3007, as amended. The undersigned further acknowledges that he/she is authorized to make such claims for his/her firm.

The undersigned also certifies that each item described above meets all of the following criteria: (1) The company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures; (2) The information is not, and has not been, reasonably attainable without the company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on a showing of special need in a judicial or quasi-judicial proceeding; (3) The information is not publicly available elsewhere; and (4) Disclosure of the information would cause substantial harm to the company's competitive position.

Signature (Owner, Operator, or Agent)		Title
Name of Inspector <i>John W. Boring</i>		Inspector's Signature <i>John W. Boring</i>
Title <i>ENROR ENROR</i>		

U.S. ENVIRONMENTAL PROTECTION AGENCY
 RECEIPT FOR SAMPLES AND DOCUMENTS

Inspector(s) Name and Address: <i>John W. Bosny</i> U.S. EPA, Region VII ENSV Division 25 Funston Road Kansas City, Kansas 66115		Firm Name and Address <i>VESCO RESOURCES</i> <i>1437 GRANT STREET</i> <i>WDA MO KANSAS CITY, MO 64116</i>
		Name of Individual <i>SAI FASONE</i>
		Title <i>DIR of TECH SERVICES</i>
Date Collected <i>2-18-83</i>	Samples were: <input type="checkbox"/> PURCHASED <input checked="" type="checkbox"/> RECEIVED NO CHARGE <input type="checkbox"/> BORROWED	
Sample Numbers	Amount Paid for Samples	
Duplicate Samples Requested <input type="checkbox"/> YES <input type="checkbox"/> NO	Method of Payment <input type="checkbox"/> CASH <input type="checkbox"/> VOUCHER <input type="checkbox"/> TO BE BILLED	

The documents and samples of chemical substances and/or mixtures described below were collected in connection with the administration and enforcement of the Resource Conservation and Recovery Act.

Receipt for the document(s) and/or sample(s) described below is hereby acknowledged:

Shipment Summary - 1 page

Signature (Owner, Operator, or Agent) <i>SAI FASONE</i>		Title <i>DIRECTOR, TECHNICAL SERVICE</i>
Name of Inspector <i>John W. Bosny</i>	Title <i>SAI FASONE</i>	Inspector's Signature <i>John W. Bosny</i>

ATTACHMENT I

(1 page)

JESCO RESOURCES, INC.

1991-1992 HAZARDOUS WASTE MANIFEST
RECORD SUMMARY

MANIFEST #005424 -	DATE	CONTRACTOR	NO. DRUMS	PROFILE NO.	LBS.	COST
0001	08/23/91	Solvent Recovery	6 3	5089 5187	3,071 802	\$ 4,867
0002	11/20/91	Solvent Recovery	9 3	5186 5187	4,580 1,503	5,287
0003	02/21/92	Solvent Recovery	1 1	5186 5187	416 398	989
0004	05/06/92	Solvent Recovery	1 1	5186 5187	464 499	824
0005	08/18/92	Solvent Recovery	2	5186	1,218	1,076
0006	09/15/92	Solvent Recovery	2	5186	1,016	900
0007	12/16/92	Solvent Recovery	1 1	5186 5868	396 35	366 275
TOTALS			31		14,398	\$ 14,584

Profile ID	Description	(May '92)	Price
#5089	Water tank bottoms/petroleum		\$ 1.45/#
#5186	Floor dry contaminated with oil		0.87/#
#5187	Waste oil sludge cleanout		0.81/#
#5868	Oil recovery filters		1.69/#

cc: R. Howell
E. Parker
C. Hoover

01/04/92

John F. L...